

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION

**FILED**

**JUN 10 2015**

**U.S. DISTRICT COURT  
EASTERN DISTRICT OF MO  
ST. LOUIS**

UNITED STATES OF AMERICA, )  
 )  
Plaintiff, )  
 )  
v. )  
 )  
EDWARD LEWIS aka EDDIE LEWIS aka )  
ERIC LEWIS, SEAN WEST aka )  
SEAN\_BALLOUT, aka SEAN ROBINSON, )  
QUENTIN COOK, CHE'YRON ROBINSON, )  
and KOREY HOWARD, )  
 )  
Defendants. )

No.

**4:15CR276 RLW/DDN**

**INDICTMENT**

The Grand Jury Charges that:

**INTRODUCTION**

**The Hazelwood, Missouri United States Postal Service Facility**

1. The United States Postal Service (USPS) operates a postal facility in Hazelwood, Missouri, within the Eastern District of Missouri, called the "Network Distribution Center" (NDC) that serves as an authorized depository for United States mail (U.S. mail or mail). The NDC receives mail from around the United States that has a destination for delivery within the Eastern District of Missouri, and elsewhere within the metropolitan St. Louis area, including southern Illinois.
2. Mail is either submitted at the NDC directly by drop-shipment customers who leave their mail at the NDC for delivery through the mail or the mail is brought to the NDC on USPS contracted trucks ("the NDC delivery trucks"), which transport mail to the NDC from around the United States.

3. When mail is delivered to the NDC by the NDC delivery trucks, designated USPS employees, usually Casuals, or Holiday Casuals (e.g. Christmas Casuals), Seasonal Casuals, or Mail Handler Associates, must unload the mail from the NDC delivery trucks into the NDC. After the mail is unloaded, those employees will sort the mail according to its destination zip code.

4. At no time is the employee who unloads or sorts the mail at the NDC permitted to open the mail, tamper with it, or place a new label on the mail that contains a different address than the label that was on the package when it arrived at the NDC.

#### **“Over-labeling”**

5. “Over-labeling” is the process where an individual creates their own label and places that label over a label or address that was previously affixed to a mail parcel by a postal customer. In some cases, the individual will also remove the original label and affix their own label to the mail parcel. The intent is to redirect the parcel to an address that the individual controls, thereby allowing the individual to steal the parcel without physically removing the parcel from a postal facility.

#### **The Defendants**

6. EDWARD LEWIS aka EDDIE LEWIS aka ERIC LEWIS (LEWIS) is a former USPS employee who worked at the USPS’s NDC in Hazelwood, Missouri, within the Eastern District of Missouri. LEWIS was employed as a Mail Handler Associate (MHA) from about May 4, 2013 to about March 15, 2014. In his position, LEWIS was responsible for unloading and sorting mail that was on the NDC delivery trucks. LEWIS at times relevant to this indictment drove a Dodge Charger, a GMC Yukon, and a Chrysler 200.

7. SEAN WEST, aka SEAN\_BALLOUT, aka SEAN ROBINSON (WEST) is a former USPS employee who worked at the USPS’s NDC in Hazelwood, Missouri, within the Eastern District of Missouri, from about November 15, 2014 to about January 5, 2015. WEST was employed as a Christmas Casual. In his position, WEST was responsible for unloading and sorting mail that was on

the NDC delivery trucks. WEST at times relevant to this indictment drove a Dodge Charger and a Chevrolet Monte Carlo.

8. QUENTIN COOK (COOK) is a current USPS employee who works at the USPS's NDC in Hazelwood, Missouri, within the Eastern District of Missouri. COOK has been employed as a Casual from approximately November 15, 2014 to the present. In his position, COOK is responsible for unloading and sorting mail from the NDC delivery trucks. Prior to working at the NDC, COOK worked as a City Carrier Assistant (CCA) at a USPS post office in Chesterfield, Missouri. COOK at times relevant to this indictment drove a black Dodge Charger and a white Dodge Charger.

9. KOREY HOWARD (HOWARD) is a former USPS employee who worked at the USPS's NDC, within the Eastern District of Missouri. HOWARD was employed as a Christmas Casual from about November 15, 2014 to about January 5, 2015. In his position, HOWARD was responsible for unloading and sorting mail from the NDC delivery trucks. HOWARD at times relevant to this indictment drove a Dodge Charger.

10. CHE'YRON ROBINSON (ROBINSON) is a resident of St. Charles, Missouri. At all times relevant to this indictment, ROBINSON was WEST's girlfriend. ROBINSON at times relevant to this indictment drove a Honda Accord.

**COUNT ONE**  
**THE CONSPIRACY AND ITS OBJECTS**  
**18 U.S.C. § 371**

11. Paragraphs 1-10 are incorporated by reference as if fully set forth herein.

12. Beginning at a time unknown to the Grand Jury, but no later than 2014, in the Eastern District of Missouri and elsewhere,

**EDWARD LEWIS aka EDDIE LEWIS aka ERIC LEWIS,  
SEAN WEST aka SEAN\_BALLOUT, aka SEAN ROBINSON,**

**QUENTIN COOK, CHE'YRON ROBINSON, and KOREY HOWARD**

the defendants herein, and others known and unknown to the Grand Jury, did knowingly and willfully combine, conspire, confederate, and agree together and with each other, and with other persons, both known and unknown, to the Grand Jury to receive, and unlawfully possess, mail knowing that the mail was stolen, taken, embezzled, abstracted, or obtained by fraud and deception; in violation of Title 18, United States Code, Section 1708.

**PURPOSE OF THE CONSPIRACY**

13. The purpose of the conspiracy was for defendants LEWIS, WEST, COOK, ROBINSON and HOWARD, and others, both known and unknown by the Grand Jury, to receive and possess stolen mail.

**MANNER AND MEANS OF THE CONSPIRACY**

14. During and in furtherance of the conspiracy, defendants LEWIS, WEST, COOK, ROBINSON and HOWARD, and others, known and unknown to the Grand Jury, employed, among others, the following manner and means:

15. Defendants WEST, HOWARD, and others known and unknown to the Grand Jury, searched for and identified mail, while working at the NDC, and over-labeled mail so that it could be redirected in the U.S. mail from its original sender's intended recipient to defendants, or others, including, but not limited to ROBINSON. Then, some or all of the defendants, and others known and unknown to the Grand Jury, retained the property that was in the mail for their personal gain.

**Addresses Where Defendants Diverted Stolen Mail**

16. From the year 2014, to the present, defendants, and others known and unknown to the Grand Jury, redirected delivery of mail that had been over-labeled and stolen to addresses, known to the Grand Jury, on the following streets in the Eastern District of Missouri, and elsewhere, including, but not limited to the following:

- i. Hobbits Glen Court, St. Louis, MO 63136 (hereinafter “the Hobbits Glen Court address.”)
- ii. Santiago Dr., Florissant, MO 63033 (hereinafter “the Santiago Dr. address.”) At all times relevant to this indictment, HOWARD resided at this address.
- iii. Country Green Ct., Florissant, MO 63033 (hereinafter “the Country Green Ct. address.”) At all times relevant to this indictment, WEST resided at this address.
- iv. San Miguel Dr., St. Charles, MO 63303 (hereinafter “the San Miguel Dr. address.”) At all times relevant to this indictment, ROBINSON resided at this address.
- v. Lariat Dr., Hazelwood, MO 63042 (hereinafter “the Lariat Dr. address.”) At all times relevant to this indictment, LEWIS and his relatives resided at this address.
- vi. Cross Keys, Florissant, MO 63033 (hereinafter “the Cross Keys address.”)
- vii. Tyrell Dr., St. Louis, MO 63136 (hereinafter “the Tyrell Dr. address.”)

17. Individuals at the above addresses, both known and unknown to the Grand Jury, agreed to accept and possess stolen mail that had been mailed to these addresses by defendants WEST, HOWARD, and others known and unknown to the Grand Jury.

18. From about November 2014 to the present, at least 5 items of mail that were processed at the NDC were diverted from their intended recipient to the Hobbits Glen address.

19. From about November 2014 to the present, at least 6 items of mail that were processed at the NDC were diverted from their intended recipient to the Santiago Dr. address.

20. From about November 2014 to the present, at least 7 items of mail that were processed at the NDC were diverted from their intended recipient to the Country Green Ct. address.

21. From about November 2014 to the present, at least 7 items of mail that were processed at the NDC were diverted from their intended recipient to the San Miguel Dr. address.



22. From about November 2014 to the present, at least 5 items of mail that were processed at the NDC were diverted from their intended recipient to the Lariat Dr. address.

23. In the year 2015, at least 2 items of mail that were processed at the NDC were diverted from their intended recipient to the Cross Keys address.

24. In the year 2015, at least 1 item of mail that was processed at the NDC was diverted from its intended recipient to the Tyrell Dr. address.

25. The contents of the mail that defendants stole, and attempted to steal, included, but was not limited to the following: clothing, marijuana, electronics, computer equipment, pottery, and personal effects.

### **OVERT ACTS**

In furtherance of the conspiracy, and to effectuate the objects of the conspiracy, one of the co-conspirators committed or caused to be committed in the Eastern District of Missouri, and elsewhere, at least one overt act, to include, but not limited to the following:

26. On or about November 17, 2014, defendant LEWIS was in possession of stolen mail that had been redirected from its intended delivery address and recipient to the Hobbits Glen Court address and to "Eric Lewis," the address and name contained on the over-label on the stolen mail.

27. On or about November 19, 2014, defendant LEWIS and COOK attempted to obtain possession of stolen mail that had been over-labeled and redirected for delivery from its intended delivery address and recipient to the Hobbits Glen Court address and to "Eric Lewis," the address and name contained on the over-label on the stolen mail.

28. On or about November 20, 2014, defendant LEWIS was in possession of stolen mail that had been over-labeled and redirected for delivery from its intended delivery address and recipient to the Hobbits Glen Court address and to "Eric Lewis," the address and name contained on the over-label on the stolen mail.

29. On or about November 21, 2014, HOWARD and WEST worked together at the NDC. While in a NDC delivery truck that contained U.S. mail that HOWARD and WEST were supposed to unload from the NDC delivery truck, HOWARD and WEST opened mail that was on the NDC delivery truck. HOWARD also stood lookout and shined a light on the mail that he and WEST opened.

30. On or about November 21, 2014, three packages were brought to the NDC by the NDC delivery trucks. HOWARD, WEST, and COOK had access to these three packages in their jobs with the USPS as they unloaded mail from these trucks on November 21, 2014. On or about November 22, 2014, the following three parcels of mail were misdirected from their intended recipients and delivered in the mail to the following addresses listed on the over-labels affixed to this stolen mail:

- i. The San Miguel Dr. address where WEST's girlfriend, ROBINSON, resided;
- ii. The Santiago Dr. address where HOWARD resided; and
- iii. The Country Green address where WEST resided.

31. In or about November 2014 and December 2014, without the Grand Jury knowing all of the specific dates, ROBINSON was in possession of stolen mail that was delivered through the mail to ROBINSON at her residence at the San Miguel Dr. address. This stolen mail had been redirected from its intended delivery address and recipient because it was over-labeled. The over-labels contained addresses that matched ROBINSON's address, the San Miguel Dr. address, and the name "Sean Robinson," which was an alias for ROBINSON's boyfriend WEST. After ROBINSON obtained possession of the stolen mail she provided it to WEST.

32. On or about December 10, 2014, ROBINSON was in possession of stolen mail that had been over-labeled and redirected for delivery from its intended recipient to ROBINSON's address, the San Miguel Dr. address. The over-label on this stolen mail listed "Sean Robinson," as the addressee.

33. On or about December 29, 2014, defendant WEST was in possession of stolen mail that had been over-labeled and redirected for delivery from its intended recipient to the Country Green

address and to Sean West, the address and name contained on the over-label. After obtaining possession of this package on or about December 29, 2014, WEST then met with LEWIS and HOWARD at the Santiago Dr. address.

34. On or about March 30, 2015, COOK was in possession of a number of Priority Mail labels, including, but not limited to a label addressed to "Sean Robinson" and the San Miguel Dr. address where ROBINSON resides.

35. On or about May 6, 2015, mail that contained an over label on it was redirected from its intended recipient and delivered to the Cross Keys address. The Cross Keys address is the address that was on the over-label. LEWIS and HOWARD waited in a vehicle, a Chrysler 200, outside of the Cross Keys address while the mail was being delivered there. Shortly after the mail was delivered, HOWARD went into the building at the Cross Keys address while LEWIS waited in the vehicle. HOWARD returned to the vehicle with the stolen mail. LEWIS and HOWARD then left the Cross Keys address in possession of the stolen mail and went first to HOWARD's residence at the Santiago address and then to LEWIS's residence at the Lariat Dr. address, leaving the parcel in the vehicle.

36. On or about May 19, 2015, a postal customer with the initials E.C. placed in the mail a mail parcel intending for it to be delivered to an address known to the Grand Jury on Ridgewood Ave. in St. Louis, Missouri. On or about May 20, 2015, that parcel was delivered to the NDC in an NDC delivery truck. COOK worked at the NDC on May 20, 2015, and May 21, 2015 and had access to the subject mail. On or about May 21, 2015, the subject mail was delivered to the Tyrell Dr. address, and not to its intended recipient at the Ridgewood Ave. address, because it had been misdirected for delivery to the Tyrell Dr. address.

37. On or about, May 28, 2015, law enforcement found in COOK's trash, at his home at an address known by the Grand Jury on Holiday Ave. in Hazelwood, MO, a mail address label that had on



it E.C.'s name listed as the sender of the mail. The label also contained a delivery address intending for it to be delivered to E.C.'s mail recipient on Ridgewood Ave. in St. Louis, Missouri.

38. On or about May 21, 2015 to about May 28, 2015, with the exact dates being unknown to the Grand Jury, COOK was in possession of stolen mail that had been over-labeled and redirected for delivery from its intended recipient to the Tyrell Dr. address.

All in violation of Title 18, United States Code, Section 371.

**COUNT TWO**  
**OBSTRUCTION OF CORRESPONDENCE**  
**18 U.S.C. § 1702**

39. Paragraphs 1-38 are incorporated by reference as if fully set forth herein.

40. On or about November 21, 2014, in the Eastern District of Missouri, the defendant WEST did open, secrete, and embezzle a package, which had been in a Post Office or authorized depository for mail matter, before it had been delivered to the intended mail recipient, with design to obstruct the correspondence of the said package or to pry into the business or secrets of the said addressee.

In violation of Title 18, United States Code, Section 1702 and 2.

**COUNT THREE**  
**OBSTRUCTION OF CORRESPONDENCE**  
**18 U. S.C. § 1702**

41. Paragraphs 1-38 are incorporated by reference as if fully set forth herein.

42. On or about the November 21, 2014, in the Eastern District of Missouri, the defendant HOWARD did open, secrete, and embezzle a package, which had been in a Post Office or authorized depository for mail matter, before it had been delivered to the intended mail recipient, with design to obstruct the correspondence of the said package or to pry into the business or secrets of the said addressee.

In violation of Title 18, United States Code, Section 1702 and 2.

**COUNT FOUR**  
**POSSESSION OF STOLEN MAIL**  
**18 U. S.C. § 1708**

43. Paragraphs 1-38 are incorporated by reference as if fully set forth herein

44. On or about May 6, 2015, in the Eastern District of Missouri, the defendants **LEWIS** and **HOWARD** did unlawfully have in their possession mail or an article contained therein, which had been stolen, taken, embezzled and abstracted from the mail, a post office, or any station thereof, a mail route, or an authorized depository for mail matter, knowing the said mail to have been stolen, taken, embezzled and abstracted from an authorized depository for mail matter.

In violation of Title 18, United States Code, Sections 1708 and 2.

**FORFEITURE ALLEGATION**

The Grand Jury further finds by probable cause that:

1. Pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461, upon conviction of an offense in violation of Title 18, United States Code, Sections 371, 1702 or 1708, as set forth in Counts 1-4, defendant(s) shall forfeit to the United States of America any property, real or personal, which constitutes or is derived from proceeds traceable to such violation(s).

2. Subject to forfeiture is a sum of money equal to the total value of any property, real or personal, constituting or derived from any proceeds traceable to such violation(s).

3. If any of the property described above, as a result of any act or omission of the defendant(s):

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;

- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

the United States of America will be entitled to the forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p).

A TRUE BILL.

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FOREPERSON

RICHARD G. CALLAHAN  
United States Attorney

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